



December 3, 2012

**EX PARTE**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Special Access for Price Cap Local Exchange Carriers,*  
WC Docket No. 05-25

Dear Ms. Dortch:

During a phone conversation discussing US Telecom's November 29 *ex parte* letter, Nick Degani of Commissioner Pai's office posed the question of the extent to which special access and similar services can be provided over hybrid fiber coaxial ("HFC") lines.

In response to this question, we submit the following information into the record. Since at least 2006, HFC lines have been capable of delivering the equivalent of ILEC TDM-based dedicated connections. In a 2006 technical specifications document describing Business Services over DOCSIS, Cable Labs explained, "Business Services over DOCSIS-TDM Emulation service (BSoD-TE) is a method for cable operators to deliver T1, E1 and NxDS0 emulation services that meet or exceed the quality requirement of applications that use such services."<sup>1</sup> The specifications document "describes the architecture and components of a network that delivers emulated T1 or E1 NxDS0 services over DOCSIS. It defines the T1, E1, or NxDS0 service delivered to the end customer, the requirements of a BSoD-TE compliant cable modem (TE-CM), the requirements of a BSoD-TE compliant CMTS (TE-CMTS), the requirements of the TDM Emulation Adaptor (TEA), and Pseudo Wires (PW) that cross the packet network connecting two EAs."<sup>2</sup> Figures 5-5 through 5-8 schematically display emulated T1 or E1 over HFC connections.<sup>3</sup> And cable companies like Charter Communications explicitly market Ethernet over coaxial facilities. Describing its Ethernet service for business on its website, Charter states, "All these sites can now be connected using standardized Ethernet services, delivered over fiber or coax."<sup>4</sup>

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<sup>1</sup> <http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf>, p. 1.

<sup>2</sup> <http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf>, p. 11.

<sup>3</sup> <http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf>, pp. 16-18.

<sup>4</sup> <http://www.charterbusiness.com/charter-business-ethernet-main.aspx>.

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Therefore, special access and similar services can be provided over HFC lines.

Please do not hesitate to contact me if there are questions concerning this *ex parte* letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is fluid and cursive, with the first name "Glenn" and last name "Reynolds" clearly distinguishable.

Glenn T. Reynolds

cc: Nick Degani  
Nick Alexander  
Michael Steffen  
Angela Kronenberg  
Christine Kurth  
Priscilla Hill Argeris